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April 10, 2009

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: ET Docket No. 09-38 and RM-11523.

Dear Ms. Dortch:

Starkey Laboratories Inc. has filed a request for a waiver (ET Docket No. 09-38) and submitted a petition for rulemaking (RM-11523) requesting a waiver and subsequent amendment of Section 15.246(a)'s minimum 6dB-bandwidth requirements.

Section 15.247(a)(2) permits operation of systems using digital modulation techniques within the 915 MHz band with a minimum 6 dB bandwidth of 500 kilohertz. Starkey Laboratories requests that Section 15.247(a)(2) be amended to allow transmitters to operate in the 915 MHz band with a narrower 6 dB bandwidth of 100 kilohertz, while maintaining the 8 dBm/3 kHz power spectral density limit specified in Section 15.247(e) of the Commission's rules.

Zarlink Semiconductor fully supports Starkey Laboratories in the requested waiver and petition for rule making:

- The proposal will provide for better and more efficient use of bandwidth, and would not cause any harmful interference. In particular, the maximum power transmitted within the proposed narrower bandwidth of 100 kHz is 7 dB less than for 500 kHz which will reduce power requirements and interference for this class of low power transmitters.
- The proposal will better support the use of low power transmitters for hearing aids and other applications that are spectrally efficient with relatively small bandwidth requirements. The products from Starkey Laboratories, based on this wireless technology, are an important innovation in hearing aid technology with valuable improvements for the end-user in terms of programming for improved algorithms and features. Clearly other categories of low power and spectrally efficient low bandwidth devices may gain similar benefits from the proposed rule-making.

Zarlink Semiconductor has been a leading provider of integrated circuits for medical applications including hearing aids for over 30 years, and is one of the few semiconductor manufacturers doing so today.

Sincerely,


Stephen J. Swift

Senior Vice President & General Manager
Medical Communications Product Group
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